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NAME OF COMMITTEE (In Full)
Christy Smith for Congress

FEC IDENTIFICATION NUMBER
C00725101

Mailing Address PO Box 301
24307 Magic Mountain Pkwy

City	State	ZIP Code
Valencia	CA	91355

This responds to your requests for additional information dated April 15, 2021, regarding the 30-day post-general, 12 day pre-general, October quarterly, July quarterly, and 30 day post-runoff reports.

The letters, in part, inquire about payments to Method Campaign Services and ask the Committee to amend its reports to disclose the names of the ultimate payees. The Commission requires disclosure of ultimate payees in certain circumstances, none of which apply here:

The committee reimburses an individual (such as a campaign staffer) who used personal funds to pay committee expenses aggregating more than \$200 to a single vendor;

The committee pays a credit card bill that includes charges of more than \$200 to a single vendor; and

The committee is the authorized committee of a candidate who used personal funds to pay committee expenses aggregating more than \$200 to a single vendor without receiving reimbursement. (See FEC Notice of Interpretive Rule 2013-09 regarding Reporting Ultimate Payees of Political Committee Disbursements.)

Here, Method Campaign Services is not a payroll company that processes the Committee's payroll. Rather, it is a campaign consulting firm that employs professionals to provide a wide variety of campaign consulting services to the Committee. Method Campaign Services, not the Committee, employs these professionals. Method Campaign Services is also responsible for payment of payroll taxes, workers compensation and other benefits that may be provided to its professional staff. Simply put, the ultimate payees of the payments at issue are employees of Method Campaign Services, not the Committee. Thus, Committee is not required to disclose the names of these professionals.

We hope this letter addresses the requested information. The Committee takes its filing obligations seriously and makes every attempt to comply with the requirements. If you need any further information, please contact the committee.

Thank you,
Marc Winger